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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY RESPONSE TO
COMMENTS AND CONCURRENCE WITH FINAL REMEDIAL INVESTIGATION REPORT FOR
SITE 21 BUILDING 1517/1506 AREA NS GREAT LAKES IL
8/22/2012
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

(217) 557-8155
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August 22, 2012

NAVFAC Midwest IPT EV
Attn: Ms. Terese Van Donsel
Building 1A
201 Decatur Avenue
Great Lakes, Illinois 60088-2801

Re: Final Remedial Investigation Report
For Site 21 – Buildings 1517/1506 Area
Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's responses to Agency comments regarding the Final Remedial Investigation Report for Site 21 – Buildings 1517/1506 Area, Naval Station Great Lakes, Great Lakes, Illinois. They were dated July 25, 2012 and were received at the Agency on July 26, 2012. Accompanying those responses was a CD containing the final version of the Remedial Investigation Report and a signature page for Illinois EPA to sign off on. The Agency has conducted a review of the Navy's responses and confirmed that the final report has been revised accordingly.

Illinois EPA provided comments regarding the Site 21 Remedial Investigation Report in three separate letters. The Navy has satisfactorily addressed all of those comments, save one. That comment addressed the use of a pH value obtained from an investigation derived waste (IDW) sample to determine a site-wide pH. The response states that a composite soil IDW sample was collected because it would be most representative of site-wide pH conditions and that a composite soil sample has typically been collected at other sites on the facility for the purpose of determining a representative site-wide pH. That is inaccurate for the following reasons:

First, that sample was not collected for that reason. It was initially collected for disposal purposes only. The Agency could not find any mention in the Sampling and Analysis Plan that stated the IDW composite sample pH value would be used to determine a site-wide pH value. Second, as already stated, use of an IDW sample to determine a representative site-wide pH is not acceptable without sufficient justification. The response states that a composite soil sample has typically been collected at

other sites on the facility for that purpose. The Agency can find but one instance where that was the case and that was a site-specific decision. One instance does not make it "typical", nor does it dictate its use elsewhere or base-wide. (In fact, use of the pH-related screening levels is not mandatory, but is merely one option for determining the appropriate soil clean-up levels.) However, when one reviews the pH screening values included in the pH-specific Soil Remediation Objectives Table for the inorganics of concern, none of the screening values for other pH values differ enough from the values used to make a significant difference, either in the number of exceedances or the calculated risk values. Therefore, the Agency will not require the Navy to collect additional samples for analysis or to recalculate the screening values at this time. However, it should be made clear that use of a single composite sample for determining site-wide pH will not be allowed in the future.


The response continues by stating that "If IL EPA feels additional pH samples should have been collected, it is suggested that this be addressed in the DQO process of future site assessments." The Agency will take that into consideration. It should be noted that this is not the first usage of the Tiered Approach to Corrective Action Objectives (TACO) regulations on base and the Navy and their contractor should have been familiar with its implementation, such that detailed instruction need not be provided. As noted above, the decision to use those pH-related soil screening levels was made by the Navy and their use was not required.

As Illinois EPA has no more comments, we will concur with the Final Remedial Investigation Report and, as such, have signed the provided signature page and are herein returning it for inclusion in the final document.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at brian.conrath@illinois.gov.

In accordance with Public Act 96-0603, which went into effect on August 24, 2009, any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Sincerely,



Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Charles Metz, Tetra Tech NUS, Inc. Owen Thompson, USEPA (SR-6J)

**REMEDIAL INVESTIGATION REPORT
FOR
SITE 21 - BUILDINGS 1517/1506 AREA**

**NAVAL STATION GREAT LAKES
GREAT LAKES, ILLINOIS**

**COMPREHENSIVE LONG-TERM
ENVIRONMENTAL ACTION NAVY (CLEAN) CONTRACT**

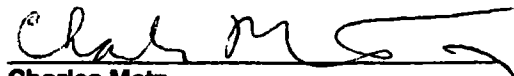
**Submitted to:
Naval Facilities Engineering Command Midwest
201 Decatur Ave., Building 1A
Great Lakes, IL 60088**

**Submitted by:
Tetra Tech
234 Mall Boulevard, Suite 260
King of Prussia, PA 19046**

**CONTRACT NUMBER N62472-03-0057
CONTRACT TASK ORDER C064**

JULY 2012

PREPARED UNDER THE DIRECTION OF:

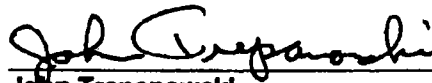


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